

Dear Sirs,

I would like to submit an **opposition to a petition for reconsideration of WT docket 05-235**, filed by Mr. Anthony Gordon on Feb 23, 2007.

Mr. Gordon contends that Morse Code is needed as a hedge for National Security and is a Core Competency of Amateur Radio.

Element 1 never did guarantee the “Core” competency of Amateur Radio operators. I know a lot of people who say they passed the test even at 20 or 13 words per minute, but say not to ask them to do any such thing now. The Amateur Radio operators who are “worth their salt” in Morse Code have those skills because of clubs and nets within ARRL or similar organizations. The Element 1 “test once” approach never did supply the country with a National Security shield skill. Amateur Radio operators maintain the skills they practice. This is one of the reasons for regular communications nets or Sky Warn or CERT team drills or DXing contests, or Fox Hunts. A good emergency or National Security response requires communication with skills practicable with a broad base of people. Most people don’t tap out Morse Code messages regularly enough to make it a “Core” skill or broad based community emergency response. Certainly there is value to having a group of individuals within the Amateur Radio community that can tap out Morse Code through interference when an EM pulse from a nuclear blast or freak solar flare has just cooked all the computers, but you don’t need to test every Amateur Extra license in the country to make that happen.

Morse Code is not “Core” to the general mission of Amateur Radio. Amateur Radio is a passion and hobby of a great many people who love the international fellowship and communications, the visiting with friends and community, the development of electronics skills, the love of science, or emergency preparedness and National Security. The FCC has identified all of these interests in its rationale for an Amateur Radio Service. As a multi-use service it must be recognized that any single interest of itself should not dictate the FCC general regulations, and may not be “Core” to the mission of amateur radio in general. As an example, in a world that has eliminated Morse Code as an international requirement, one is hard pressed to explain why Morse Code is “Core” to a international fellowship mission, or for that matter visiting with friends and community, or fostering a knowledge base about electronics and science. If it can be called “Core” to anything it is only a National Security and Emergency Communications Mission which falls short of the breadth required to continue as a license requirement, even for Amateur Extra.

I would like to question whether it is “Core” to National Security and Emergency Communications skill. As one who got into amateur radio for the sake of emergency communications, I probably share Mr. Gordon’s passion that if any one thing could justify the amateur radio service by itself it is Emergency Communications with its associated implications for National Security, but when I look at Emergency Communications in at least my area I find no evidence that Morse Code is “Core”. Our Sky Warn network uses voice. Our County Emergency Management Agencies link amateur radio to community and first responder resources by voice. We have a local communications group with the humanitarian purpose of providing emergency back-up communications between injured or damaged community sectors and relief agencies. Voice is the only communication that most members of our communities know and our most critical issue is communication with enough people in enough locations to profile a disaster in our area to relief agencies. This has to be a voice exercise! We must communicate with the broadest base of people. We could not get the participation base we need if amateur radio was covered with a wall of Morse Code. Making sure radio services can share information between systems is a far bigger and more critical issue than who can tap out Morse Code.

ARRL just completed a report on recommendations for emergency response readiness of Amateur Radio operators. Their biggest concerns centered on people who were not competent to handle messages in a standard format and with standard priority levels for getting messages through. I am not sure that an “Element One” should not be part of an Amateur Extra license, but if that element is to be Core to a National Security Mission, I’m afraid I could not in good conscious say that element would be a Morse Code element.

As to whether **Morse Code is a valuable Emergency and National Security skill** I think Mr. Gordon has a point, **but the point is more properly served in another context.** When the FCC no longer could maintain a National Testing Program within the agency for Amateur Radio Licensing the ARRL and other Amateur Radio groups stepped forward with plans to administer the tests via a group of Volunteer Examiners. Today the ARRL sponsors contests for DXing around the world or contacting all 50 States. They have clubs that work with Morse Code and even “straight key”. The time for people interested in radio’s tradition of Morse Code to step forward with their own clubs and certifications has come. **The FCC cannot and should not enforce a heritage skill when other measures or skills for National Security and Emergency Preparedness have been clearly identified as more critical.** Managing limited resources is a skill required in all aspects of life including determining which elements have broad enough implications to be Core to the Mission of Amateur Radio. The FCC acted correctly in its WT docket 05-235.

Thank you for your attention
Sincerely

Dr. Bradley C Paul